

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 24-70 (JWB/TNL)

| | | |
|---------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | Discovery Declaration and |
| |) | Outline of Pre-Trial Motions |
| v. |) | |
| |) | |
| ASHLEY ANNE DYRDAHL, |) | |
| |) | |
| Defendant. |) | |

Ashley Dyrdaahl is charged in an eleven-count indictment with Conspiracy, Straw Purchasing, and False Statement During the Purchase of a Firearm between on or about September 21, 2023 and January 25, 2024. Through counsel, she respectfully offers the following declaration concerning the status of discovery in this case and outline of the pre-trial motions that are being filed.

DISCOVERY

Counsel received discovery via USA-FX on March 26, 2024, April 30, 2024, and May 2, 2024. The discovery contains large amount of reports, recording, photographs and videos. The discovery contains no obvious omissions under Rule 16 of the Federal Rules of Criminal Procedure.

MOTIONS

Aside from the discovery motion, Counsel has filed the following motions:

1. Disclosure of 404(b) evidence
2. Disclosure of Brady evidence
3. Disclosure of Expert Testimony
4. Retention of Rough Notes

Counsel does not anticipate testimony will be required.

MEET AND CONFER

On August 2, 2024, the undersigned and AUSA Thomas Calhoun-Lopez conferred by phone pursuant to and in accordance with L.R. 12. 1 to clarify and narrow issues.

Dated: August 2, 2024

Respectfully submitted,

s/Manny K. Atwal

MANNY K. ATWAL

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